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16 Counsel for Robins Cloud LLP

17 UNITED STATES BANKRUPTCY COURT  
18 NORTHERN DISTRICT OF CALIFORNIA  
19 SAN FRANCISCO DIVISION

20 In re	) Case No. 19-30088 (DM)
21 PG&E CORPORATION,	)
22 and	) Chapter 11
23 PACIFIC GAS AND ELECTRIC	) (Lead Case–Jointly Administered)
24 COMPANY	)
25 Debtors	)
26	) <b>DECLARATION OF ROBERT</b>
27	) <b>BRYSON IN SUPPORT OF MOTION</b>
28 Affects:	) <b>FOR ORDER AUTHORIZING</b>
29 <input type="checkbox"/> PG&E Corporation	) <b>WITHDRAWAL OF COUNSEL TO</b>
30 <input type="checkbox"/> Pacific Gas & Electric Company	) <b>THOMAS M. JENKINS Jr.</b>
31 <input checked="" type="checkbox"/> Both Debtors	)
32	)
33 * All papers shall be filed in the Lead	)
34 Case, No. 19-30088 (DM).	)
35	)

1 **Declaration of Robert Bryson**

2 I, Robert Bryson, say and declare as follows:

3 1. I am an individual over 18 years of age and competent to make this declaration.

4 2. I am an attorney with the law firm of Robins Cloud LP (the "Firm"), attorneys of  
5 record for Thomas M. Jenkins Jr. ("Creditor").<sup>1</sup> I am duly admitted to practice law before all  
6 courts of the State of California and before this court.

7 3. I make this declaration in support of the Firm's motion to be relieved as counsel  
8 to Creditor in the above-captioned bankruptcy case ("Motion"). The facts set forth below are true  
9 and within the scope of my personal knowledge, and if called upon to do so I could and would  
10 testify competently to these facts.

11 4. On January 29, 2019, Debtors filed voluntary petitions commencing their  
12 bankruptcy cases.

13 5. On October 16, 2019, the Firm filed Proof of Claim No. 28411 ("Claim") on  
14 behalf of Creditor. Since the filing of the Claim, an irreconcilable difference has developed  
15 between Creditor and the Firm. As a result, the Firm notified Creditor that it must withdraw as  
16 counsel.

17 6. To the extent that Creditor requests that the Firm turn over any files or  
18 information that he is entitled to, the Firm will cooperate and transmit such files.

19 7. The Firm will cause the Motion to be served on all of the addresses provided to  
20 the Firm by Creditor, including the following:

21 1311 Taylor Lane,  
Magalia, CA 95954

P.O. Box 204  
Gridley, CA 95948

22  
23 I declare under penalty of perjury that the foregoing is true and correct.

24 Executed on October 25, 2021.

25  
26   
Robert Bryson

27  
28 <sup>1</sup> The Firm retained Grimshaw Law Group, P.C. ("GLG") to, among other things, assist it in filing this motion. GLG has no contractual or attorney/client relationship with Creditor.